

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

Plaintiff, :

-against- : Docket No. 08 CR 211(AKH)

PARVINDER DOSANJH, : NOTICE OF MOTION

Defendant. :

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S I R S :

PLEASE TAKE NOTICE that, upon the annexed declaration of Thomas P. Sleisenger, counsel for Defendant, duly affirmed to on the 17th day of July, 2008, the memorandums of law and all proceedings heretofore had herein, the undersigned shall move the District Court for the Southern District of New York, before the Honorable Alvin K. Hellerstein, at 500 Pearl Street, New York, New York 10007, for an ORDER:

- (1) compelling the government to disclose Rule 16 material well in advance of trial;
- (2) compelling the government to disclose *Brady* material reasonably in advance of trial;
- (3) precluding the government from introducing certain “other crimes” evidence it may seek to offer under Fed.Rules.Evid. 404(b), 403 and 401, and for notice of all “other crimes” evidence to be offered at trial;
- (4) compelling the government to disclose to the defense the name and address of each expert, if any, that it intends to call at trial and to provide a summary of his/her anticipated testimony, and the reports, studies or other data on which such expert testimony will rely;
- (5) directing the government to provide a limited bill of particulars;
- (6) directing the government to provide a witness list; and

(7) reserving Ms. Dosanjh's right to make other motions necessitated by the disclosure of additional facts, including motions *in limine* to exclude evidence offered by the government.

Dated: July 17, 2008
Los Angeles, California

Respectfully submitted,

_____/s/_____
THOMAS P. SLEISENGER
1901 Avenue of the Stars, Suite 615
Los Angeles, CA 90067
(310) 300-1314
Counsel to Defendant

TO: Jeffrey A. Brown, Esq.
United States Attorneys Office
One St. Andrews Plaza
New York, N.Y. 10007

Clerk of the Court
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 11201

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, : Docket No. 08 CR 211(AKH)

Plaintiff, : DECLARATION

-against- :

PARVINDER DOSANJH, :

Defendant. :
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THOMAS P. SLEISENGER, declare as follows:

1. I am an attorney duly admitted to practice law in the State of California and before this Court based on order of admission pro hac vice. My law offices are located at 1901 Avenue of the Stars, Suite 615, Los Angeles, California 90067. I represent defendant, Parvinder Dosanjh, in this case.

2. This affidavit is submitted in support of defendant's motions for an order:

(1) compelling the government to disclose Rule 16 material well in advance of trial;

(2) compelling the government to disclose *Brady* material reasonably in advance of trial;

(3) precluding the government from introducing certain "other crimes" evidence it may seek to offer under Fed.Rules.Evid. 404(b), 403 and 401, and for notice of all "other crimes" evidence to be offered at trial; (4) compelling the government to disclose to the defense the name and address of each expert, if any, that it intends to call at trial and to provide a summary of his/her anticipated testimony, and the reports, studies or other data on which such expert testimony will rely; (5) directing the government to provide a limited bill of particulars; (6) directing the government to provide a witness list; and (7) reserving Ms. Dosanjh's right to make other motions necessitated by the disclosure of additional facts, including motions *in limine* to exclude evidence offered by the government.

2. I have conferred with Assistant United States Attorney Jeffrey A. Brown regarding the various requests for discovery and the request for a bill of particulars.

Notwithstanding the fact that we have discussed these matters, the motion(s) must be brought for defendant to obtain the relief sought.

3. All other facts necessary for a determination of the instant motion(s) are set forth in the accompanying memorandum of law and exhibit which are incorporated herein by reference.

WHEREFORE, for the foregoing reasons, defendant's motion(s) should be granted in their entirety.

I declare under penalty of perjury so that foregoing is true and correct. Executed on July 17, 2008, at Los Angeles, California.

/s/
THOMAS P. SLEISENGER